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5 Attorney for Material Witnesses
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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (Honorable Barbara L. Major)

11 UNITED STATES OF AMERICA,) CASE NO. 08MJ1115
12)
Plaintiff,)
13 vs.) DECLARATION OF THOMAS G. GILMORE
IN SUPPORT OF MOTION FOR
14 Marco Antonio Contreras-Perez) VIDEOTAPE DEPOSITION AND
SUBSEQUENT VOLUNTARY DEPORTATION
15) OF MATERIAL WITNESSES
DATE: May 20, 2008
16 Defendant.) TIME: 9:00 a.m.
PLACE: Courtroom of Magistrate
17 Barbara L. Major

18 I, Thomas G. Gilmore declare:

19 I am an attorney duly licensed to practice before all the
20 courts of this State, District and Circuit, and am the attorney of
21 record for the material witnesses in the above action, Ruben Lopez-
22 Basulto, Juan Castillo-Vega and Giovanni Venancio-Nieves.

23 I have personal knowledge of the facts set forth in this action
24 and could testify competently thereto if called.

25 My clients in this action have been in federal custody since
26 April 10, 2008 because they cannot locate anyone to post bond for
27 them.

28 My clients entered the United States to find work to support

1 family members at home in their country of origin. Each day they
2 remain in custody is an additional hardship on themselves and their
3 families.

4 Based on the above it respectfully requested that this motion
5 be granted, that said depositions take place at the earliest
6 possible time, and that my clients be allowed to voluntarily return
7 home to their country of origin immediately thereafter.

8 I declare under the penalty of perjury under the laws of the
9 State of California that the foregoing is true and correct of my own
10 personal knowledge except as to those matters stated to be based
11 upon information and belief and, as to those matters, I am informed
12 and believe that they are true and correct.

13 Executed this 29th day of April, 2008, in San Diego,
14 California.

15 /ss/ Thomas G. Gilmore
16 THOMAS G. GILMORE, Attorney for
Material Witnesses
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